

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: TESTOSTERONE REPLACEMENT THERAPY PRODUCTS LIABILITY LITIGATION	MDL No. 2545 Master Docket Case No. 1:14-cv-01748 Honorable Matthew F. Kennelly
CRAIG MOGLER Plaintiff, vs. ABBVIE INC., ET AL. Defendants.	Civil Action No.: 1:15-cv-02431 STIPULATION OF DISMISSAL WITHOUT PREJUDICE

STIPULATION OF DISMISSAL WITHOUT PREJUDICE

IT IS HEREBY STIPULATED AND AGREED by and between counsel for the Plaintiff and counsel for Defendants that Plaintiff claims against ALL DEFENDANTS are hereby dismissed without prejudice pursuant to Fed. R. Civ. P. 41., subject to the following conditions:

1. Plaintiff moves to dismiss all claims against Defendants;
2. Plaintiff has not previously dismissed an action based on or including the same claims as those present in this case;
3. Should Plaintiff or a representative of Plaintiff attempt to re-file or assert any of the same or similar claims against Defendants (or any individual or entity related to Defendants) in another action, they shall: (a) do so only by filing said claims in federal court, (b) not name any defendant(s) who would destroy the federal court's diversity jurisdiction, and (c) not oppose transfer to this MDL No. 2545.

Date: September 18, 2015

Respectfully submitted,

/s/ Rachal G. Rojas
David P. Matthews
Steve Faries
Lizy Santiago
Rachal G. Rojas, Esq.
MATTHEWS & ASSOCIATES
2905 Sackett Street
Houston, TX 77098
(713) 222-8080
(713) 535-7184 FAX
dmatthews@dpmlawfirm.com
sfaries@dpmlawfirm.com
lsantiago@dpmlawfirm.com
rrojas@dpmlawfirm.com

Attorneys for Plaintiff

/s/ K.C. Green
Joseph P. Thomas, Esq.
Jeffrey F. Peck
K.C. Green
Jeffrey D. Geoppinger, Esq.
ULMER & BERNE LLP
600 Vine Street, Suite 2800
Cincinnati, OH 45202
(513) 698-5000
(513) 698-5001 FAX
jthomas@ulmer.com
jpeck@ulmer.com
kcgreen@ulmer.com
jgeoppinger@ulmer.com

Attorneys for Defendants Actavis, Inc.; Actavis Pharma, Inc.; and Watson Laboratories, Inc., a Nevada corporation

/s/ Christopher R. Boisvert
Christopher R. Boisvert
DECHERT LLP
Cira Centre
2929 Arch Street
Philadelphia, PA 19104-2808
(215) 944-4000
(215) 994-2222
chip.boisvert@dechert.com

Attorneys for Defendants AbbVie Inc. and Abbott Laboratories

/s/ Cara D. Edwards
Loren H. Brown
Cara D. Edwards
DLA Piper LLP
1251 Avenue of the Americas, 27th Floor
New York, New York 10020-1104
United States

Matthew A. Holian
Jessica C. Wilson
33 Arch Street, 26th Floor
Boston, MA 02110
(617) 406-6009
matt.holian@dlapiper.com
jessica.wilson@dlapiper.com

Attorneys for Defendants Pfizer, Inc. and Pharmacia & Upjohn Company Inc.

CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2015, the foregoing document was filed with the Clerk via CM/ECF. Notice of this filing will be sent by operation of the Court's electronic filings system to all parties indicated on the electronic filings receipt. Parties may access this filing through the Court's system.

/s/ Rachal G. Rojas

Rachal G. Rojas